

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

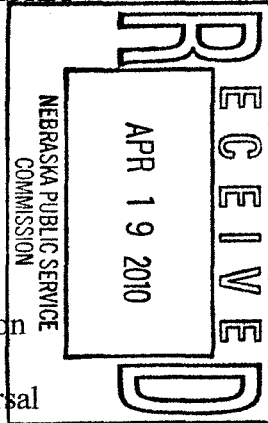
In the Matter of the Petition of the) Application No. NUSF-77
Nebraska Telecommunications Association)
for Investigation and Review of) **COMMENTS OF COX NEBRASKA**
Processes and Procedures Regarding) **TELCOM, LLC**
the NUSF.)

INTRODUCTION

Cox Nebraska Telcom, LLC ("Cox") hereby files these comments for the Nebraska Public Service Commission's ("Commission") consideration in Application NUSF-77. While Cox does not receive high-cost support from the Nebraska Universal Service Fund ("NUSF"), developing sound processes and procedures regarding the NUSF is critical for all telecommunications companies. Furthermore, Cox is a recipient of NUSF monies as it relates to serving low-income customers through the Nebraska Telephone Assistance Program ("NTAP"). Therefore, Cox files these comments pursuant to the Hearing Officer Order entered on March 10, 2010 inviting parties to submit a list of issues for consideration in this docket on or before April 19, 2010.

IMPLEMENT A BROADBAND GRANT PROGRAM

On January 14, 2010, the Nebraska Telecommunications Association ("NTA") petitioned the Commission to commence an investigation and review regarding the NUSF. The NTA Petition includes a brief recitation of the Commission's comments filed with the Federal Communications Commission ("FCC") in response to the FCC's November 13, 2009 request for comments in its Broadband Investigation. Specifically, the Commission requested the FCC to:



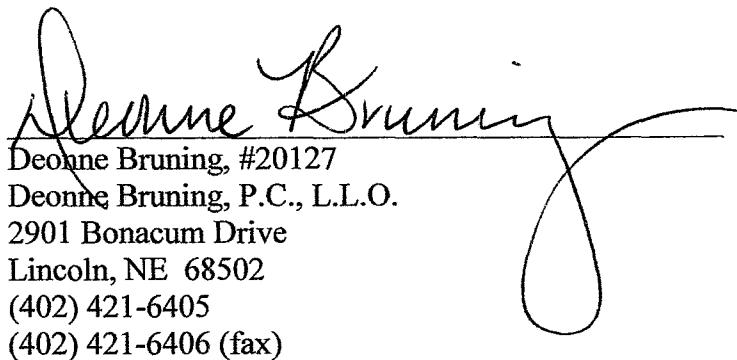
- (1) [A]ctively work with states in partnership to develop ideas and create innovative solutions to the challenges posed by barriers to broadband deployment; . . .
- (2) [E]stablish a contribution methodology that clearly defines the obligations of all providers; and, all providers regardless of technology must be included;
- (3) [Require that] [a]ll states should have a responsibility to supplement the federal mechanism and to compliment the universal service goals developed by the Commission;
- (4) [Require that] [s]upport should be targeted to high-cost areas where broadband services are not being deployed and would not be deployed absent universal service support;....and
- (5) [R]equire better reporting of high-cost and Lifeline/Link-up support to avoid potential misuse of universal service support monies.

The NTA believes the above-mentioned policy positions recommended by the Commission should not only be evaluated by the FCC in the context of federal USF support, but should also be subject to evaluation and review within Nebraska. Cox supports a review of these issues and in addition encourages the Commission to specifically examine the creation of a grant program whereby telecommunications carriers or other qualified providers may be eligible to receive NUSF support for the deployment of broadband services in unserved areas. Cox believes such a grant program could function in a manner similar to the NUSF grant program currently offered to wireless carriers. The details of the program, including defining eligible recipients, qualified service areas and the concept of requiring matching contributions from companies could be undertaken as part of the Commission's investigation. In addition, the Commission could develop a system for prioritization assuming the need for financial support from eligible carriers exceeds the funding made available through the NUSF.

As the Commission is well aware, a state-of-the-art, robust telecommunications network requires offering consumers high-speed broadband services. Yet, the fact remains some Nebraskans do not enjoy the benefits of traditional high-speed broadband service due to the prohibitive cost of deployment. The Commission could play a vital role to close the small gap that remains in Nebraska by developing a broadband deployment grant fund as a part of the NUSF. Accordingly, Cox would appreciate the Commission adding this concept to the list of issues that will be examined and reviewed as a part of the investigation in NUSF-77.

Respectfully submitted this 19th day of April.

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Certificate of Service

The undersigned certifies that an original and five (5) copies of the foregoing Comments of Cox Nebraska Telcom, LLC were hand delivered on April 19, 2010 to the Nebraska Public Service Commission; 1200 N St., Suite 300, Lincoln, NE 68508, with a copy of the same e-mailed to the following:

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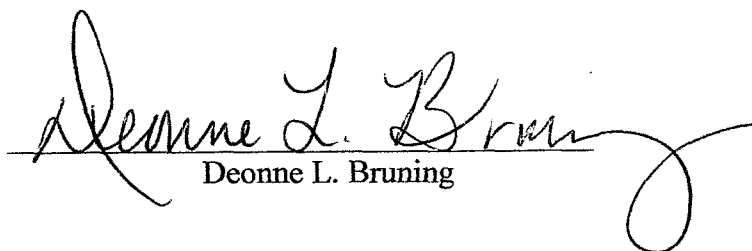
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